

# EXHIBIT B

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**From:** Helen Chaitman  
**Sent:** Tuesday, November 13, 2018 6:34 PM  
**To:** Cremona, Nicholas J.  
**Cc:** Greg Dexter; Bell, Stacey A.  
**Subject:** RE: Notice of Subpoena of Walter T. Tiletnick

We will not agree to the discovery you have proposed for the reasons we have submitted to Judge Bernstein.

Helen Davis Chaitman  
Chaitman LLP  
465 Park Avenue  
New York, New York 10022  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
Cell: (908) 303-4568  
Fax: (888) 759-1114

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**From:** Cremona, Nicholas J. [mailto:ncremona@bakerlaw.com]  
**Sent:** Tuesday, November 13, 2018 6:24 PM  
**To:** Helen Chaitman <hchaitman@chaitmanllp.com>  
**Cc:** Greg Dexter <gdexter@chaitmanllp.com>; Bell, Stacey A. <sbell@bakerlaw.com>  
**Subject:** Notice of Subpoena of Walter T. Tiletnick

Helen,

We are in receipt of the subpoena that your firm served on Walter T. Tiletnick for the first time in 69 adversary proceedings, without regard to whether fact discovery is open or closed in those cases. I note that this subpoena is in addition to the 27 other trader subpoenas that you have already served in these proceedings.

Among the cases in which you seek Mr. Tiletnick's testimony are 40 cases where discovery closed prior to entry of the August 10, 2017 stipulation and order staying discovery deadlines. This is a tacit acknowledgment that the relief sought in the Trustee's motion is appropriate and additional discovery of former BLMIS employees is warranted – notwithstanding the contradictory position you took in your objection to the Trustee's motion for limited additional discovery (the "Motion"). Nevertheless, the Trustee is willing to consent Mr. Tiletnick's deposition in all 69 cases listed in Schedule A to the subpoena provided that your clients are willing to agree that the Trustee can take the depositions of the former BLMIS employees set forth in the Motion in those same cases.

Please advise how your clients would like to proceed as soon as possible.

Regards,

Nick

**Nicholas J. Cremona**  
Partner

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**BakerHostetler**

45 Rockefeller Plaza  
New York, NY 10111-0100  
T +1.212.589.4682

ncremona@bakerlaw.com  
bakerlaw.com



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